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WWW.RIVKINRADLER.COM

KENNETH C. MURPHY

PARTNER

(516) 357-3154

casey.murphy@rivkin.com

926 RXR Plaza
Uniondale, NY 11556-0926
T 516.357.3000 F 516.357.3333

June 11, 2024

VIA ELECTRONIC MAIL

Hon. Mary Kay Vyskocil
United States District Court Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Roman Shamalov
(23-cr-110)(MKV)

Dear Judge Vyskocil:

We are counsel to the Defendant in the above-referenced matter. We write this letter pursuant to Rule 3 of Your Honor's Individual Rules of Practice in Criminal Cases.

Pursuant to the current conditions of Mr. Shamalov's bail (ECF No. 102), Mr. Shamalov is not permitted to travel outside the Eastern or Southern Districts of New York. We write to respectfully seek a modification of those conditions for one day, specifically, June 16, 2024. On that day, Mr. Shamalov's cousin, Zhana Aronov, will be married in a ceremony at The Legacy Castle, located at 141 Route 23 South, Pompton Plains, New Jersey starting at 5:00 p.m. Pompton Plains is approximately twenty-eight miles from New York City. Mr. Shamalov respectfully seeks permission to travel from his home in the Eastern District of New York in order to attend the event. He will return home immediately thereafter.

Mr. Shamalov has been compliant with all of his pretrial restrictions. I have conferred with counsel for the Government, AUSA Jeffrey Coyle who informed me that he consents to this request. In addition, I have sent emails to Mr. Shamalov's Pretrial Officer, Domenique Jackson, but, unfortunately, she has not responded to my request. She did send a text message to Mr. Shamalov in response to his request stating: "You can have your lawyer email me for my formal position, however, Pretrial Services take no position on travel as long as court approval is granted."

I thank the Court for its time and attention to this matter.

GRANTED. Defendant must check in with Pretrial Services upon his return. SO ORDERED.

Date: 6/13/2024

New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully Submitted,

Kenneth C. Murphy

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